

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

John Charlie KOFRON, aka "Jay C"

Case No. 2:20mj1164

Defendant(s)

FILED
MAY 20 2020
David J. Bradley, Clerk of Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2019 and July 16, 2019 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. § 841 (a)(1)(A)

Offense Description

Knowingly, intentionally, and unlawfully possess with intent to distribute a controlled substance in Schedule I of the Controlled Substance Act of 1970, to wit; 39.74 grams of methamphetamine, approximate gross weight.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P. 4.1, and probable cause found:

Date: May 20, 2020City and state: Corpus Christi, Texas

Andy Trevino DEA TFO
 Complainant's signature

Andy Trevino, Task Force Officer

Printed name and title

Julie K. Hampton
 Judge's signature

Julie K. Hampton, U.S. Magistrate Judge

Printed name and title

Attachment A


On April 17, 2019, DEA Corpus Christi Resident Office Special Agents (SA) and Task Force Officers (TFO), utilizing a Confidential Source (CS1), conducted a controlled purchase of methamphetamine from a subject known by CS1 as "Jay C". At approximately 2:18 p.m. on April 17, 2019, "Jay C" was observed driving a white Chevrolet Z71 4X4 with black fender flares into the parking lot of the One Market convenience store, located at 4214 Carroll Lane, Corpus Christi, Texas. CS1 entered "Jay C"'s vehicle, and "Jay C" sold methamphetamine to the CS1 from inside Jay C'S vehicle. Approximately two minutes later, CS1 exited from "Jay C"'s vehicle, entered an undercover vehicle, and provided TFO Trevino with a clear plastic zip lock bag containing five smaller zip lock bags, each containing a clear hard crystalline substance that "Jay C" sold to CS1. The clear hard crystalline substance field-tested positive for the presence of methamphetamine. The aggregated gross weight of the hard crystalline substance was 20 grams. Laboratory analysis indicates the substance to be Methamphetamine Hydrochloride with 12.54 grams aggregated net weight at 97% substance purity.

On July 16, 2019 in the early afternoon, DEA Agents and officers established surveillance at "Jay C"'s residence in zip code 78411 area in Corpus Christi, Texas. Soon afterwards at approximately 1:30 pm, CS1 contacted "Jay C" via telephone call to arrange a purchase of one (1) ounce of methamphetamine from "Jay C" in parking lot of the One Market convenience store, located at 4214 Carroll Lane, Corpus Christi, Texas. "Jay C" agreed to sell CS1 one (1) ounce of methamphetamine. TFO Trevino, acting in an undercover capacity, drove CS1 to the predetermined location. At approximately 2:16 pm, surveillance units observed a white Tahoe backing out of the rear driveway of "Jay C"'s residence. At approximately 2:45 pm, surveillance units observed "Jay C", driving the white Tahoe, arriving at the parking lot of the One Market convenience store, located at 4214 Carroll Lane, Corpus Christi, Texas. At approximately 2:47 pm, CS1 exited TFO Trevino's vehicle and entered "Jay C"'s white Tahoe. Approximately two minutes later, CS1 exited the vehicle and returned to TFO Trevino's vehicle. TFO Trevino took custody of one latex glove from CS1. The latex glove contained a clear plastic wrap. The clear plastic wrap contained a clear hard crystalline substance. The clear hard crystalline substance field-tested positive for the presence of methamphetamine. The aggregated gross weight of the hard crystalline substance was 29.03 grams. Laboratory analysis indicates the substance to be Methamphetamine Hydrochloride with 27.2 grams aggregated net weight at 98% substance purity.

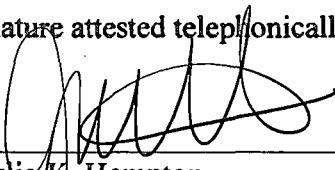
CS1 was shown a six-person photo lineup and identified John Charlie KOFRON as "Jay C", the person who sold CS1 methamphetamine on April 17, 2019 and on July 16, 2019 in the parking lot of One Market convenience store.

DEA Agents and officers obtained trash that was located in trash receptacle located off the curtilage at KOFRON's residence on August 07, 2019, March 18, 2020, and April 29, 2020. Multiple clear plastic baggies were located from the trash on all three dates, and they tested positive for the presence of cocaine on all three dates.

Distribution may be inferred from the amount of methamphetamine seized and findings of the trash pulls.


Andy R. Trevino,
Task Force Officer
Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P 4.1., and probable cause found:


Julie K. Hampton
United States Magistrate Judge